

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE UNITED STATES OF AMERICA,

v.

KURT WALTER,

Defendant

)
)
)
) Criminal No. 03-10370-DPW
)
)
)
)
)
)

**DEFENDANT KURT WALTER'S MOTION
TO TRAVEL OUTSIDE JURISDICITON**

Now comes the defendant Kurt Walter and asks this Court to allow him to travel outside the jurisdiction to drive his son to an Outward Bound Program in Maine. The program starts on June 26, 2005 and ends on July 15, 2005. Defendant Walter will simply drop off and pick up his son on the above dates.

In support of his motion, Defendant Walter states that he has physical custody of his son.

Respectfully submitted,

/S/ William J. Cintolo
William J. Cintolo (BBO #084120)
Cosgrove, Eisenberg and Kiley, P.C.
One International Place
Boston, MA 02110
(617) 439-7775

Dated: June 13, 2005